

**DECLARATION OF** [REDACTED]

I, [REDACTED], make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. My name is [REDACTED]. I am over the age of 18 and am competent to testify regarding the matters described below.
2. I am a citizen of the United States. I live in Phoenix, Arizona.
3. G.B., my husband, is Haitian and won withholding of removal to Haiti on or about November 13, 2015. He was arrested and detained by ICE on or around July 9, 2025. Without prior notice or an opportunity to contact a lawyer, he was deported to Mexico on or around September 6, 2025. He has no connection to Mexico and had never been there before.
4. I have a deep fear and worry I live with every day regarding my husband's situation. He was deported to Mexico, a country that is not his home and where he has no family, community, or strong support system. He regularly tells me how afraid he is living there. He tries to hide the fact that he is Haitian because of the prejudice and potential violence he would face from Mexicans if they learned he was Haitian. He speaks only English with a Haitian he knows there because he is afraid that speaking Creole would alert Mexicans to his Haitian identity.
5. Knowing that he is there, alone and vulnerable, fills me with constant anxiety and uncertainty. His safety is always on my mind. I fear for his safety, for his ability to find work, and for his stability in a place that is unfamiliar and where he faces risks simply for being Haitian in Mexico. I worry about his health, his safety, and his emotional state being so far away from his family and our children.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge.

Executed this 7 day of November 2025 at Phoenix, Arizona.

[REDACTED]